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5 **FREEDOM LAW FIRM**

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11 *Attorneys for Plaintiffs Richard Klein, Raymond Urias,
12 and Sandra J. Gunter, individual, and on behalf of all others similarly situated*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 Richard Klein, Raymond Urias and Sandra J.
16 Gunter, individually and on behalf of all others
17 similarly situated,

18 CASE NO:2:22-cv-01392-GMN-BNW

19 **CLASS ACTION**

20 Plaintiffs,
21 -vs.-

22 **STIPULATION AND PROPOSED
23 ORDER FOR EXTENDING TIME FOR
24 PLAINTIFFS TO RESPOND TO
25 DEFENDANTS' MOTION TO DISMISS
(FIRST REQUEST)**

26 National Collegiate Student Loan Trust 2005-
27 3, *et al.*,

28 Defendant.

29 **Current Response Date: March 27, 2023
30 New Response Date: April 10, 2023**

31 Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs, Richard Klein, Raymond
32 Urias and Sandra J. Gunter (“Plaintiffs”) and Defendant, American Education Services,
33 LLC (“AES” or “Defendant”) (Plaintiff and Defendant collectively referred to as the “Parties”),
34 by and through their respective counsel of record, hereby stipulate, agree and respectfully request
35 that the Court extend the deadline for the Plaintiffs to file their response to Defendant’s Motion
36 to Dismiss (ECF No. 42) from March 27, 2023 to April 10, 2023.¹

37 ¹ AES Motion to Dismiss was filed on March 13, 2023.

1 1. On December 23, 2022, Plaintiffs filed their First Amended Complaint. ECF NO.
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3 2. On December 29, 2022, Plaintiffs served the Summons and First Amended
4 Complaint on AES. ECF No. 24.

5 3. Therefore, AES' original response due date was January 19, 2023.

6 4. Defendant and the Plaintiffs agreed to an extension of time for Defendant to
7 respond to the First Amended Complaint through and until February 6, 2023. ECF No. 28.

8 5. Defendants then needed additional time to evaluate the information necessary to
9 appropriately respond to respond to the First Amended Complaint and the Parties agreed to
10 extension of time to respond to the First Amended Complaint through and until March 8, 2023.
11 ECF No. 28.

12 6. Counsel for AES fell ill and the Parties agreed that AES shall have up to and
13 including March 15, 2023 to file its responsive pleading to the Amended Complaint. ECF No.
14 43.

15 7. On March 13, 2023, filed its Motions to Dismiss Amended Complaint ("Motions
16 to Dismiss"). ECF NO. 42.

17 8. Plaintiffs' deadline to respond to these Motions to Dismiss set for March 27, 2023.

18 9. The Parties have discussed extending the deadline for Plaintiffs to respond to AES'
19 Motions to Dismiss in light of the multiple motions to dismiss that have been filed in this case
20 and the complexity of the matter.

21 WHEREAS, the parties hereby stipulate and agree to extend the deadline for Plaintiffs to
22 file their responsive pleading to AES' Motions to Dismiss (ECF Nos. 2) to April 10, 2023.

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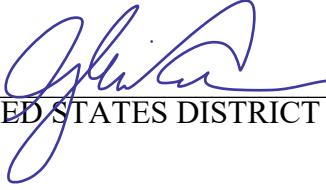
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1 **IT IS SO STIPULATED.**

2	Dated: March 21, 2023	Dated March 21, 2023
3	FREEDOM LAW FIRM	BROWNSTEIN HYATT FARBER SCHRECK, LLP
4	<u>/s/ George Haines</u> George Haines, Esq. Nevada Bar No. 9411 Gerardo Avalos, Esq. Nevada Bar No. 15171 8985 South Eastern Ave., Suite Suite 350 Las Vegas, Nevada 89123	<u>/s/ Monique S. Jammer</u> Patrick J. Reilly, Esq. Nevada Bar No. 6103 Monique S. Jammer, Esq. Nevada Bar No. 15420 100 North City Parkway, Suite 1600 Las Vegas, Nevada 89106 Telephone: 702.382.2101 Facsimile: 702.382.8135 .
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14	Gary M. Klinger* 227 W. Monroe Street, Suite 2100 Chicago, IL 60606 Phone: 866.252.0878 gklinger@milberg.com	
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16		
17	*to motion for appearance <i>pro hac vice</i> <i>Attorneys for Plaintiffs and the Proposed Class</i>	
18		

19 **ORDER**

20 **IT IS SO ORDERED.**



UNITED STATES DISTRICT JUDGE

21 Dated: March 21, 2023

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